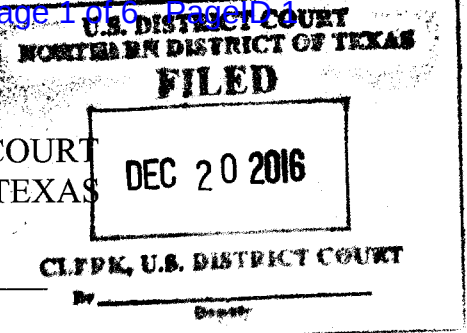


ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

UNDER SEAL

v.

No. **7:16-cr-015-O**

JACKIE EUGENE CLAYTON (01)
JUAN CARLOS LOPEZ (02)
RUDY ROMAN RAMIREZ (03)
JUAN LEONARDO TELLO (04)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Distribute a Schedule II Controlled Substance
(21 U.S.C. § 846)

Beginning on or about December 2014, the exact date being unknown to the grand jury, and continuing until on or about December 3, 2015, in the Wichita Falls Division of the Northern District of Texas, **Jackie Eugene Clayton, Juan Carlos Lopez, Rudy Roman Ramirez, and Juan Leonardo Tello**, defendants, did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree together and with each other, and with other persons both known and unknown to the Grand Jury, to commit certain offenses against the United States, namely, to possess with intent to distribute and distribute five grams or more of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

MANNER AND MEANS

During the conspiracy alleged herein, it was part of the conspiracy that one or more of the defendants and co-conspirators would:

1. Arrange for the acquisition of methamphetamine from sources both known and unknown to the Grand Jury;
2. Utilize residences and other locations within the Northern District of Texas as locations to package and distribute quantities of methamphetamine to customers;
3. Deliver and distribute, and coordinate delivery and distribution of, quantities of methamphetamine to persons both known and unknown to the Grand Jury within the Northern District of Texas and elsewhere;
4. Act as intermediaries and brokers to negotiate the acquisition, price, sale, and delivery of, and collection of payment for, quantities of methamphetamine; and
5. Utilize communication facilities including telephones and cellular telephones to discuss, negotiate and facilitate drug transactions.

In violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1)(B)(viii).

Count Two
Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))

On or about March 21, 2016, in Dallas County, within the Northern District of Texas, the defendant, **Jackie Eugene Clayton**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is, one Glock, Model 23, .40 caliber pistol bearing serial number NWE309.

In violation of 18 U.S.C. § 922(g)(1).

Forfeiture Notice

[21 U.S.C. § 853(a); 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]


Pursuant to 21 U.S.C. § 853(a), upon conviction for the offense alleged in Count One of this indictment, **Jackie Eugene Clayton, Juan Carlos Lopez, Rudy Roman Ramirez, and Juan Leonardo Tello**, defendants, shall forfeit to the United States any property constituting or derived from proceeds obtained, directly or indirectly, as a result of the offense and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense.

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction for the offense alleged in Count Two of this indictment, **Jackie Eugene Clayton**, defendant, shall forfeit to the United States all firearms and ammunition involved or used in the commission of the respective offense, including one Glock, Model 23, .40 caliber pistol bearing serial number NWE309.

A TRUE BILL


FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY

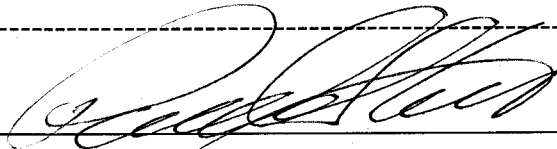

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Facsimile: 214.659.8803

Warrant to be Issued - In State Custody

**Jackie Eugene Clayton (01) – Dallas County, Dallas, TX; Rudy Roman Ramirez (03)
– Middleton Unit, Abilene, TX**

Warrant to be Issued

Juan Carlos Lopez (02); Juan Leonardo Tello (04)

A handwritten signature in black ink, appearing to read "Rudy Roman Ramirez", is written over a solid horizontal line. Above this line is a dashed horizontal line.

UNITED STATES MAGISTRATE JUDGE

No Criminal Matter Pending

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

THE UNITED STATES OF AMERICA

v.

JACKIE EUGENE CLAYTON (01)
JUAN CARLOS LOPEZ (02)
RUDY ROMAN RAMIREZ (03)
JUAN LEONARDO TELLO (04)

INDICTMENT

21 U.S.C. § 846

Conspiracy to Distribute a Schedule II Controlled Substance

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

21 U.S.C. § 853(a); 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Forfeiture Notice

2 Counts

A true bill rendered

DALLAS


FOREPERSON

Filed in open court this 20th day of December, 2016.
